

**IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

JUDICIAL WATCH, INC.,	:	NO. 1:120-cv-00708
	:	(Judge Christopher C. Conner)
Plaintiff,	:	
	:	
v.	:	
	:	
COMMONWEALTH of	:	
PENNSYLVANIA, et al.,	:	
	:	
Defendants.	:	

MOTION TO DISMISS OF THE COUNTY DEFENDANTS

Defendants Bucks County Commission, Bucks County Board of Elections, Bucks County Registration Commission, Thomas Freitag, in his official capacity as Elections Director for Bucks County, Chester County Commission, Chester County Board of Elections, Chester County Registration Commission, Sandra Burke, in her official capacity as Director of Elections in Chester County, Delaware County Council, Delaware County Board of Elections, Delaware County Registration Commission, and Laureen Hagan, in her official capacity as Chief Clerk, Elections Bureau for Delaware County (the “County Defendants”), hereby move this Court for an order dismissing the claims asserted against them in the

Complaint. The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated by reference.

WHEREFORE, the County Defendants respectfully request that the Court grant this Motion and dismiss the claims asserted against them in the Complaint.

Respectfully,

HANGLEY ARONCHICK SEGAL
PUDLIN & SCHILLER

Date: July 10, 2020

By: /s/ Mark A. Aronchick
Mark A. Aronchick
Michele D. Hangley
Christina C. Matthias
One Logan Square, 27th Floor
Philadelphia, PA 19103
Telephone: (215) 496-7050
Email: maronchick@hangley.com

Counsel for County Defendants